

Reasonable Adjustments Policy



Sandwell
Metropolitan Borough Council

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Owner	<i>Tom Hogan (Head of Customer Experience)</i>		
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Purpose	<i>Sandwell Council's Reasonable Adjustments Policy ensures equal access to housing services for residents with disabilities and/or vulnerabilities by outlining when and how reasonable modifications can be made. In accordance with the Equality Act 2010, the policy specifies what adjustments are available, the process for requesting them, and how the Council will address requests. The goal is to eliminate barriers and provide fair, accessible housing services for all residents.</i>		

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1. Purpose

- 1.1 As part of Sandwell Council's ongoing commitment to improving the accessibility and quality of its Housing Services, we aim to ensure that all tenants and residents receive a consistent, high standard of service—regardless of how they choose to contact or engage with the Housing Service.
- 1.2 Sandwell Council is committed to ensuring that all housing residents, including those with disabilities and/or vulnerabilities, have equal access to our services. The Council acknowledges its legal responsibility to make reasonable adjustments to housing services and related processes to remove barriers and ensure that disabled and/or vulnerable residents can fully access and benefit from our services.
- 1.3 This policy outlines what is meant by a 'reasonable adjustment', the circumstances in which changes may be made, how residents can request an adjustment, and how the Housing Service will consider and respond to such requests.

2. Scope

- 2.1 This policy outlines Sandwell Council Housing Services' commitment and legal obligation under the Equality Act 2010 to consider and, where appropriate, implement reasonable adjustments to ensure fair and equitable access to its housing services.
- 2.2 The Housing Service is committed to ensuring that its policies, procedures, and service delivery do not place individuals with disabilities and/or vulnerabilities at a disadvantage. In accordance with the Equality Act 2010, Sandwell Council must take reasonable steps to remove or reduce such disadvantages. The aim is to ensure that all tenants and residents can access a comparable level and quality of housing service to that received by other service users, wherever reasonably possible.

- 2.3 Many of the adjustments offered through Housing Services may also benefit residents who do not have a disability and/or vulnerability. These are considered on a case-by-case basis to support inclusivity and good customer service.

3. What is Reasonable Adjustments to Sandwell Council?

- 3.1 Reasonable adjustments are changes that Sandwell Council Housing Services can make to its policies, processes, communication methods, or physical environments to ensure that individuals with disabilities and/or vulnerabilities are not placed at a disadvantage when accessing housing services. While primarily intended to support those with disabilities, such adjustments may also benefit others, depending on individual circumstances.
- 3.2 Examples of reasonable adjustments may include providing tenancy-related information in alternative formats and languages (such as large print, easy-read, or other languages), offering support with completing forms or attending appointments, or making changes to office layouts or facilities to improve physical accessibility. Sandwell Council will consider each request on a case-by-case basis and will implement adjustments where it is reasonable and practical to do so, in line with the Equality Act 2010. The overall aim is to remove barriers and ensure equal access to housing services for all residents.
- 3.3 This policy does not attempt to detail every situation where an adjustment might be required. Adjustments are only required where it is reasonable to make them. Determining what is reasonable will depend on several factors, including:
- the nature of the individual's disability or vulnerability;
 - the practicality of implementing the adjustment;
 - whether the proposed change would effectively address the disadvantage experienced;
 - the size and capacity of the organisation;
 - the availability of resources;
 - the cost involved in making the adjustment;
 - whether any previous adjustments have already been made.

Defining Disability

3.4 Under the Equality Act 2010, a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to carry out normal day-to-day activities.

3.5 What 'substantial' and 'long-term' mean:

- 'substantial' is more than minor or trivial, e.g. it takes much longer than it usually would to complete a daily task like getting dressed.
- 'long-term' means 12 months or more, e.g. a breathing condition that develops as a result of a lung infection.

There are special rules about recurring or fluctuating conditions, e.g. arthritis.

3.6 The Equality Act 2010 provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all. In order to achieve equality, you can treat a disabled and/or vulnerable person better or 'more favourably' than any other person and sometimes this may be part of the solution.

3.7 Definition of disability under the Equality Act 2010 can be found here:

<https://www.gov.uk/definition-of-disability-under-equality-act-2010>

Defining Vulnerability

3.8 The Housing Service defines 'vulnerable' in relation to the provision of its services as customers who:

- Have a particular characteristic which makes it more difficult for the individual to access council housing and related housing services and/or
- Experience an exceptional life event and/or
- Are currently unable to act independently and/or

- Are unable to cope with managing their tenancy without additional support.
- 3.9 The council understands that vulnerability can be a dynamic or changeable state influenced by multiple factors and experiences such as age, disability, bereavement, mental health, domestic violence, poverty etc.
- 3.10 Whilst some of the factors are constant, some may be a life event, such as bereavement or domestic violence, which may not necessarily remain a permanent state. It is the interaction of these factors that will determine how vulnerable a person is at any point in time and how much additional assistance they may require to sustain their tenancy.
- 3.11 In addition, an individual's ability to act, engage or cope with everyday activities varies, irrelevant of their age, sex, disability etc and so is an important factor in considering vulnerability.
- 3.12 Given the fluid nature of individual situations, we will proactively strive to keep our information up to date. However, the service can be further improved when customers also keep us informed of their changing circumstances.

4. Policy Statement

When Adjustments Should be Made

- 4.1 The Housing Service will comply with the Equality Act 2010 and its duty to make reasonable adjustments for disabled or vulnerable people. The duty is anticipatory, meaning that the council must think proactively about what adjustments might be required and make them in advance, rather than waiting for a specific request. This is particularly important with hidden disabilities or vulnerabilities when an individual may feel unable to volunteer their need for a reasonable adjustment until asked.
- 4.2 Under the Act, there is a legal duty to make adjustments in the following three circumstances:

- Where there is a provision, criterion or practice which puts a person with a disability at a substantial disadvantage. This could be in relation to a relevant matter that puts a disabled person at a disadvantage in comparison to a non-disabled person.
- Where a physical feature of a building or other premises may put a person with a disability and/or vulnerability at a significant disadvantage compared to a non-disabled person.
- Where a person with a disability and/or vulnerability would, but for the provision of an auxiliary aid or additional service, be put at a substantial disadvantage in comparison to a non-disabled person.

Requesting a Reasonable Adjustment

4.3 The council will routinely ask if reasonable adjustments are required when individuals access its services. However, individuals are also encouraged to contact the council at any time to request an adjustment. The council will make every effort to accommodate requests and will suggest additional adjustments where appropriate. The council may also recommend adjustments that the individual may not have thought of, to ensure that their needs are fully met. In some cases people will not know what adjustments they require or what can be provided, and in these circumstances we can discuss a range of possible options to meet the individual needs.

4.4 Customers can request that we make reasonable adjustments in the following ways:

- in person
- in writing for example by email or by post
- by telephone
- by a family member when we have been given permission to do so; and or
- a member of staff may suggest for one to be made, when they are aware it will support the customer needs.

4.5 Contact Details

- Contact Sandwell Council's Housing team via MySandwell, by phone or by post:

- **Online:** Report the issue directly through the [MySandwell portal](#).
- **Phone:** 0121 569 6000 (office hours are Monday to Friday, 8am-5.30pm).
- **Post:** Sandwell Council, PO Box 2374, Oldbury, B69 3DE.

The Council's Assessment and Response to a Request

4.6 We will not assume what reasonable adjustments a disabled and/or vulnerable person may need. But we will consider any request and discuss this with the person to agree any possible changes.

4.7 Before making reasonable adjustments, we need to consider some important factors:

- what the disadvantage would be if the change was not made
- whether the change will be effective in reducing the disadvantage
- how practical it is to make it
- whether it would disrupt our other activities
- the cost and availability of resources, including external help and finance

We will agree reasonable adjustments without delay. But, in some cases we may need to consider the request in more detail.

4.8 There may be circumstances where we decide not to meet the request. The law says we should adjust if they are 'reasonable'. We will record the reasonable adjustments requested and the decision made.

4.9 The council will assess requests for reasonable adjustments on a case-by-case basis, taking into account factors such as the nature of the adjustment, the cost and practicality of making the adjustment, and the availability of resources. The council will aim to agree on reasonable adjustments with a minimum of delay and implement them in a timely way. If the council cannot agree to make an adjustment, it will provide a clear explanation of why it is not possible and suggest alternative adjustments where appropriate.

Keeping a Record of Customer's Needs

- 4.10 Any request for a reasonable adjustment made by a resident will be recorded on Sandwell Council's internal housing systems and used to ensure their specific needs are met consistently whenever they contact or engage with Housing Services.
- 4.11 The Council will take proactive steps to review and update this information regularly, ensuring that any agreed reasonable adjustments remain relevant and in place. These adjustments will be kept under ongoing review in line with the resident's changing needs.
- 4.12 We are committed to protecting individuals' privacy. Personal data will be collected, stored, and used in accordance with the General Data Protection Regulation (GDPR) 2016 and the Data Protection Act 2018. If personal information needs to be used for a purpose not originally specified, the Council will inform the individual and explain the lawful basis for doing so.

Our Staff

- 4.13 Our staff within Sandwell Council Housing Services will be trained on the principles of reasonable adjustments to ensure they can provide an inclusive and supportive service to all residents. Additionally, we will regularly review the training needs of all public-facing staff to ensure they are fully aware of their duties and responsibilities under the Equality Act 2010.

Appeals

- 4.14 If an individual is unhappy with the council's response to a request for reasonable adjustments or with the adjustments made, they may make an appeal. The council will respond to an appeal in a timely manner, and work with the individual to resolve any issues.

- 4.15 Details of how to make comments, give feedback or make a complaint can be found here:
www.sandwell.gov.uk/feedback
- 4.16 The council website is compliant with all legal requirements for accessibility.

5. Development of Policy

- 5.1 Sandwell Council recognises the importance of clear and effective communication in ensuring reasonable adjustments are carried out efficiently and customers are supported throughout the process. To achieve this, the Council are consulting residents on an updated draft version of this policy, providing opportunities to submit feedback both online and in person.
- 5.2 Incorporating resident input into the development of this policy enables the Council to enhance its approach to reasonable adjustments, ensuring that the services provided meet the needs of tenants and leaseholders.

6. Related Documents

- 6.1 The Reasonable Adjustments Policy will align with our existing policies and strategies but will also influence and guide a range of supporting or inter-related policies and procedures.
- 6.2 This will ensure that the management of our assets is part of a wider approach to delivering high quality services and places for the benefit of our residents. The key documents that should be read in conjunction with this policy include:
- [Sandwell Council Plan 2024 – 2027](#)
 - [Sandwell Housing Strategy 2023 – 2028](#)
 - [Tenant Handbook](#)
 - [SMBC Tenancy Conditions](#)
 - [Leaseholder Handbook](#)
 - [Sandwell Council Vision 2030](#)
 - [Complaints Procedure](#)

7. Legal Framework

7.1 Sandwell Council is committed to ensuring that its Reasonable Adjustment Policy complies with all relevant legislation and regulatory requirements. By implementing this policy, the Council aims to meet its legal obligations and responsibilities, including the following:

- Equality Act 2010
- The Disability Discrimination Act 1995 (as amended)
- Human Rights Act 1998
- Health and Social Care Act 2012
- Special Educational Needs and Disability (SEND) Code of Practice
- Public Sector Equality Duty (PSED)
- Regulator for Social Housing Consumer Standards
- Accessible Information Standard

7.2 The Council will ensure that reasonable adjustments are made in line with these legal obligations, promoting fairness, inclusion, and accessibility for all residents.

8. Equality and Diversity

8.1 Sandwell Council will ensure equal and fair access to our services; we will do this by taking into consideration the individual needs of our tenants, their family or other persons living with them. We will ensure that individual needs are considered throughout the reasonable adjustments process and make changes where necessary.

8.2 The Council will treat people fairly and with dignity and respect.

8.3 All staff are trained in Equality, Diversity, and Inclusion to embed understanding about where we may need to adapt normal policies, procedures, and ways of working to accommodate resident's individual needs. This is mandatory training which is monitored by our Learning and Development Team. Our Equality, Diversity and

Inclusion Framework also meets our duties under the Equality Act 2010.

8.4 **ST*R Model**

As part of Sandwell Council's commitment to creating an inclusive, supportive, and accessible environment, the Council has adopted the ST*R practice model in its approach to implementing reasonable adjustments for tenants. This model is grounded in three core principles that shape how the Council responds to the diverse needs of individuals requiring adjustments:

- 1) **Strengths-Based Approach:** Sandwell Council recognises that every individual possesses unique strengths, abilities, and potential. The Council's approach focuses on identifying and building upon these strengths, enabling tenants to live independently and with dignity. By working collaboratively with individuals, the Council supports them in identifying practical solutions that enhance their daily lives and well-being.
- 2) **Trauma-Informed Approach:** The Council acknowledges that some individuals requesting reasonable adjustments may have experienced trauma, stress, or ongoing health challenges. As such, its services are designed to be sensitive, compassionate, and non-judgemental. Interactions are conducted in a way that ensures individuals feel safe, respected, and empowered to express their needs without fear or stigma.
- 3) **Relationship-Based Approach:** The Council understands that strong, trusting relationships are vital to delivering effective and personalised support. Staff are trained to engage with empathy, respect, and open-mindedness, ensuring tenants feel heard and valued. These positive relationships underpin a supportive environment in which reasonable adjustments can be identified and implemented in a way that genuinely meets individual needs.

By embedding the ST*R practice model into Sandwell Council's Reasonable Adjustment Policy, the Council reinforces its commitment to delivering accessible, responsive, and person-centred services. This ensures that all tenants receive the appropriate adjustments, respect, and support they need to thrive in their homes and communities.

9. Monitoring and Review

- 9.1 This Policy will be reviewed every three years or sooner if there are significant changes in legislation, management, a major incident or if it is no longer suitable.

10. Policy Document Version Control

Version	Date	Description	Updated By	Approved By
1.0				
2.0				